



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/25/2024

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July 25, 2024

BY ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

MEMO ENDORSED

Re: Thorn Lawless v. The City of New York, et. al.,
23 CV 09106 (VEC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing defendants City of New York, Diarmuid O'Sullivan, and Daniel Magee in the above-referenced matter.¹ In that capacity, I write with the consent of plaintiff's counsel, J. Remy Green, Esq., to respectfully request a thirty-day adjournment of the Initial Pretrial Conference from August 2, 2024 to September 6, 2024, and a corresponding extension of time to submit the Joint Letter from July 25, 2024 to August 29, 2024. This is the first request to adjourn the Initial Pretrial Conference and corresponding extension of time.

The reason for the request is because defense counsel of record, Peter Scutero, is no longer employed by this Office as of July 19, 2024. As such, this case was recently assigned to Assistant Corporation Counsel Yini Zhang, who is scheduled for admission to the federal judiciary on July 30, 2024 and will file a Notice of Appearance thereafter. Defendants respectfully requests an adjournment of the Initial Pretrial Conference for newly assigned counsel to fully review the matter and for the parties to develop a Case Management Plan.

¹ This case has been assigned to Assistant Corporation Counsel Yini Zhang, who is a member of the New York State Bar and is waiting admission to the federal judiciary. ACC Zhang is handling this matter under supervision and may be reached at (212) 356-3541 or yinzhan@law.nyc.gov.

In view of the foregoing, it is respectfully requested that the Court grant the within request. Thank you for your consideration herein.

Respectfully submitted,

/s/ *Jenny Weng*

Jenny Weng
Senior Counsel
Special Federal Litigation Division

cc: J. Remy Green, Esq. (By ECF)
Attorney for Plaintiff

Application GRANTED. The Initial Pretrial Conference scheduled for Friday, August 2, 2024, at 10:00 A.M. is ADJOURNED to **Friday, September 27, 2024, at 10:00 A.M.** The deadline for the parties to submit a joint proposed case management plan and joint letter containing the information listed on page 2 of the Court's June 21, 2024, Order, Dkt. 20, is extended from Thursday, July 25, 2024, to **Thursday, September 19, 2024.**

SO ORDERED.



7/25/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE